

**DATE OUT:** 7/21/2014

**SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[ ]; MUP [X]; EUP [ ]**

**BARCODE NO.:** 419512 **REG./FILE SYMBOL NO.:** 82012-3

**PRODUCT NAME:** Antimicrobial Copper Allys - Group III **MRID NOS:** 469993-01, 471608-01, 471608-02, 472592-01, 482363-01, and 483496-01

**COMPANY NAME:** Copper Development Association, Inc. **ACTION CODE:** 676

**FROM:** Sergey Alekseyev, Chemist  
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**THROUGH:** Maria Rivera Piansay, Acting Team Leader  
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**TO:** Bonnie Adler, CRM  
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#### **INTRODUCTION:**

A Reregistration Eligibility Decision (RED), Case No. 4025, was issued on 07/2006, and an Amended RED was issued on 05/2009 for the Active Ingredient Coppers. According to the RED, the generic database supporting the reregistration of Coppers for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Coppers RED, Copper Development Association, Inc. provided EPA Form 8570-35 (Data Matrix), dated 05/11/2012; EPA Form 8570-4 (Confidential Statement of Formula), a basic formulation, dated 08/01/2012; a draft label, punch date 05/16/2013; and MRID Nos. 469993-01, 471608-01, 471608-02, 472592-01, 482363-01, and 483496-01. The registrant is requesting reregistration of the product, Antimicrobial Copper Allys - Group III, EPA Reg. No. **82012-3**.

#### **FINDINGS:**

1. EPA Reg. No. **82012-3** is a manufacturing-use product containing the active ingredient Coppers, with a label claim nominal concentration of 82.6%, and other ingredients content of 17.48%. The product is for use in manufacturing and fabrication of touch surface components for use in various public, commercial, and residential buildings. The product is produced by a non-integrated system.
2. The CSF for the basic formulation is acceptable. The nominal concentration of the active ingredient agrees with that on the label, meeting PR Notice 91-2. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
3. Data reported in MRID Nos. 469993-01, 471608-01, 471608-02, 472592-01, 482363-01, and 483496-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. There are no data present that would trigger Physical or Chemical Hazards statements. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice

83-3.

**Note to PM:** Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

**CONCLUSIONS:**

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. **82012-3**.

**Product Chemistry Data**

**Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)**

<b>GUIDELINE REFERENCE NO. (GRN)/ TITLE 830</b>	<b>40 CFR §</b>	<b>MRID Number</b>	<b>Data Fulfilled</b>
.1550 Product Identity and Composition	158.320	CSF, 469993-01, and 472592-01	Y
.1600 Description of Materials Used to Produce the Product	158.325	469993-01	Y
.1620 Description of Production Process	158.330		N/A
.1650 Discussion of Formulation Process	158.165		N/A
.1670 Discussion of Formation of Impurities	158.167	469993-01	Y
.1700 Preliminary Analysis	158.345		N/A
.1750 Certified Limits	158.350	482363-01 and 483496-01	Y
.1800 Enforcement Analytical Method	158.355	469993-01	Y

**Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)**

<b>Guideline Reference No. (GRN) / Title 830</b>	<b>Value or Qualitative Description</b>	<b>MRID Number</b>	<b>Data Fulfilled</b>
.6302 Color	PR Notice 92-5		N/A
.6303 Physical State	Solid	471608-01	Y
.6304 Odor	PR Notice 92-5		N/A
.6313 Stability	The product is not TGAI/MP		N/A
.6314 Oxidation/Reduction Chemical Incompatibility	The product is not oxidizer/reducer.	471608-01	Y
.6315 Flammability/Flame Extension	The product is not flammable.	471608-01	N/A
.6316 Explodability	The product is not potentially explosive.	471608-01	N/A
.6317 Storage Stability	Molecules of the product are stable.	471608-01	W
.6319 Miscibility	The product cannot be miscible with water	471608-01	N/A
.6320 Corrosion Characteristics	The product does not react with packaging material	471608-01	W
.6321 Dielectric Breakdown Voltage	The product is not intended to be used around electrical equipment	471608-01	N/A
.7000 pH	The product is not miscible with water.	471608-01	N/A
.7050 UV/ Visible Light Absorption	Not applicable. The product is not TGAI/MP.		N/A
.7100 Viscosity	The product is solid.	471608-01	N/A
.7200 Melting Point	Not applicable. The product is not TGAI/MP.		N/A
.7220 Boiling Point	Not applicable. The product is not TGAI/MP.		N/A
.7300 Density/Bulk Density	7.21 to 9.41 g/cm <sup>3</sup>	471608-01	Y
.7370 Dissociation Constant in Water	Not applicable. The product is not TGAI/MP.		N/A
.7550 Octanol/ Water Partition Coefficient	Not applicable. The product is not TGAI/MP.		N/A
.7840 Solubility to Water and Organic Solvents	Not applicable. The product is not TGAI/MP.		N/A
.7950 Vapor Pressure	Not applicable. The product is not TGAI/MP.		N/A

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived